



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

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JUL 22 2005

Alan B. Bjornsen, CEP  
NEPA Coordinator  
U.S. Army Garrison West Point  
IMNE-MIL-PWF-I  
Building 667B, Ruger Road  
West Point, NY 10996-1592

Dear Mr. Bjornsen:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Assessment (DR/EA) for the Community Activities Center Complex, United States Army Garrison West Point, West Point, Orange County, New York. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, PL 91-604 12(a), 84 Stat. 1709), and the National Environmental Policy Act (NEPA).

The proposed action would involve the construction of a new Community Activities Center (CAC) Complex. The Complex would include an Activity Center, Athletic Facilities, and a Physical Fitness Center. The purpose of this project is centralizing a variety of recreational and fitness activities into a single core, therefore improving its visibility and operational efficiency to engage more of the West Point community.

Four options were originally considered in developing the preferred alternative:

- Option 1, the No Action Alternative, would leave existing conditions as is.
- Option 2, the Old Post Exchange (PX) Site Alternative, would seat the new CAC facilities on the location of the existing Old PX (building 683) and contiguous areas.
- Option 3, H Lot Alternative, has limited area for the Complex. This lot is located away from residential and school facilities at West Point, and is being contemplated for a rugby facility.
- Option 4, J Lot Alternative, is near the Cadet Support Zone and has inadequate parking space. Major residential and school facilities are not located next to Lot J.

Comments:

To assist in improving the facility's visibility and operational efficiency we recommend the use of alternative/green building materials throughout the project. Materials such as, *plastic lumber*, *plastic-wood*, *porous concrete*, *cinder gravel*, *modular blocks*, and *crushed granite* are widely available and their use in any aspect of the project should be evaluated. The use of these materials is well established (see internet sites on alternative/green materials), particularly as a method to reduce stormwater runoff (the number one cause of stream channel degradation and a major factor in ground water contamination) due to permeability features. By using these alternative building materials the structures' life expectancy increases, the maintenance needs are

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enormously reduced, and they are weather, insect and vandalism resistant without increasing the cost in relation to conventional materials. Additionally, the creation of rain gardens, ponding basins and green roofs or eco-roofs might help to harvest rainwater for other uses.

In the DR/EA's Air Quality section, the recommended alternative anticipated that the newly constructed buildings will be heated with natural gas if available, and a diesel generator would provide back-up; however, oil will be used if gas is not available. You might want to consider solar, geothermal or waste heat recovery. Further, Mechanical Systems (active renewable energy design; 90% or higher efficiency furnace or boiler with sealed combustion) should also be considered. For more information on green/efficient resources visit: <http://p2rx.org/>.

Based on our review, we do not anticipate that the implementation of this project as proposed, would result in significant adverse impacts and, therefore, do not object to its implementation. Thank you for the opportunity to comment. Should you have any questions please call Maria Clark, of my staff, at (212) 637-3789.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Grace Musumeci".

Grace Musumeci, Chief  
Environmental Review Section  
Strategic Planning and Multi-Media Programs Branch